

EXHIBIT 3
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,)
Plaintiff,)
vs.) Case No.
UBER TECHNOLOGIES, INC.;) 17-cv-00939-WHA
OTTOMOTTO, LLC; OTTO TRUCKING LLC,)
Defendants.)
_____)

HIGHLY CONFIDENTIAL - OUTSIDE COUNSEL'S EYES ONLY

VIDEOTAPED DEPOSITION OF JENNIFER HAROON

San Francisco, California

Wednesday, July 26, 2017

Volume I

Reported by:

MARY J. GOFF

CSR No. 13427

Job No. 2664313

PAGES 1-222

Page 1

1 identification and is attached to the transcript.) 09:55:29

2 Q Okay. Ms. Haroon, the reporter has handed 09:55:30

3 you what's been marked as Exhibit 1136. Can you 09:55:50

4 look at through this, please -- 09:55:55

5 A Yes. 09:55:56

6 Q -- and let me know when I can ask a 09:55:56

7 question? 09:55:58

8 A Okay. 09:58:44

9 Q Do you recognize this document? 09:58:44

10 A I do. 09:58:46

11 Q Okay. And what is this document? 09:58:47

12 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

17 Q And what was the purpose of those 09:59:06

18 discussions? 09:59:09

19 A They varied. They normally involved 09:59:15

20 talking about progress on the project, some of our 09:59:18

21 future plans. And in this case, also budget. 09:59:23

22 Q Okay. And the document is entitled 09:59:29

23 "Self-Driving Car: 2016 Budget, Including HC 09:59:34

24 Plans," correct? 09:59:39

25 A Correct. 09:59:40

1

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8

Q Okay.

01:41:24

9

A So some of the supporting documents

01:42:10

10

support some of the things that I have already

01:42:13

11

mentioned that are no longer part of --

01:42:16

12

Q Understood.

01:42:19

13

A -- were no longer part of the plan.

01:42:19

14

Q Understood.

01:42:21

15

MS. BAILY: Just for the written record,

01:42:22

16

the witness obviously did not read every line of

01:42:22

17

this document. I -- that's not what I understood

01:42:25

18

you to ask her to do, but for the written record.

01:42:27

19

MR. TAKASHIMA: Agreed.

01:42:31

20

Q (BY MR. TAKASHIMA) Flipping back to the

01:42:32

21

page ending 1484.

01:42:33

22

A 1484.

01:42:36

23

■

■

01:42:52

1 [REDACTED] [REDACTED]
2 [REDACTED] [REDACTED]
3 [REDACTED] [REDACTED]
4 [REDACTED] [REDACTED]
5 [REDACTED] [REDACTED]
6 [REDACTED] 02:10:17
7 So for example, between -- for February 02:10:21
8 and March 2016, those are not necessarily unique 02:10:24
9 times that we relooked at this. 02:10:29
10 Q Okay. But these -- these four dates seem 02:10:31
11 to indicate that there was some revisit in 2016, 02:10:37
12 2014, and 2013; is that fair to say? 02:10:40
13 MS. BAILY: Object to form. 02:10:44
14 A That's fair to say. Although, I don't 02:10:46
15 know if the 2013 was a revisit or potentially the 02:10:48
16 original. I wasn't there. 02:10:51
17 Q The visit. Okay. Are those -- are those 02:10:53
18 dates -- I mean, in the native format of this 02:11:08
19 document, would those dates be links? 02:11:11
20 MS. BAILY: Object to form. 02:11:14
21 A Yes. 02:11:15
22 Q Okay. To what? 02:11:17
23 MS. BAILY: Object to form. 02:11:18
24 A I don't remember. Likely to a slide 02:11:22
25 discussion document. 02:11:27

1 supplier team. 04:42:49

2 Q Okay. And then, I guess, respectively 04:42:49

3 headcount for products, business and operations? 04:42:55

4 A Right. And business is -- broadly 04:42:59

5 includes things like marketing, PR, policy. 04:43:03

6 Q Okay. I understand that you're not 04:43:06

7 familiar with this specific version of the 04:43:13

8 spreadsheet. [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] 04:43:27

11 MS. BAILY: Object to form. 04:43:30

12 A I don't. So there were not a lot of 04:43:34

13 people who had regular access to the P&L. But there 04:43:36

14 would be times where it would make sense, perhaps 04:43:39

15 someone from my team, to save on -- still on Google 04:43:43

16 Drive, their own version and because of research 04:43:48

17 they were doing, to make changes. 04:43:53

18 And that's why I don't recognize this 04:43:55

19 being at any time the official P&L, because I don't 04:43:59

20 recognize it at all. So it's possible, for example, 04:44:01

21 that whoever may -- saved this version was looking 04:44:04

22 at headcount issues. 04:44:09

23 Q Okay. Looking -- just based on looking at 04:44:11

24 two different files, is there a way we would be able 04:44:22

25 to determine whether you were looking at sort of one 04:44:24

1 of the official P&L versions or one of these sort of 04:44:27
2 individually workshopped versions? 04:44:31
3 MS. BAILY: Object to form. 04:44:34
4 A So if I had the file name, there was a 04:44:35
5 specific file name used for the official version 04:44:38
6 that I would likely recognize. 04:44:45
7 And then there are -- certainly like this, 04:44:49
8 there are times when I can just look at the contents 04:44:52
9 and know that it's not an official version. But I 04:44:56
10 don't know if I would be able to identify -- you 04:44:58
11 know, if there was one cell change -- 04:45:00
12 Q Okay. 04:45:03
13 A -- from an official version, if that was 04:45:03
14 not one. 04:45:05
15 Q Okay. And do you recall what the official 04:45:06
16 file name was for the -- the official versions? 04:45:10
17 A I don't recall the full name. But 04:45:15
18 certainly there would be as part of it, in brackets, 04:45:19
19 "Go, slash, Chauffeur P&L." 04:45:24
20 And normally when people made their own 04:45:28
21 version to -- to do some testing or to test some 04:45:31
22 changes, for themselves they would label -- they 04:45:36
23 would add on some label, like what they were doing 04:45:39
24 it for. 04:45:43
25 Q Okay. I'm going to the next tab, which is 04:45:44